

October 29, 2001

Mr. Carl W. Krull  
United Technologies - Otis Elevator  
1331 South Curry Pike  
Bloomington, Indiana 47403

Re: 105-10972  
First Significant Revision to  
Part 70 No. 105-10972-00006

Dear Mr. Krull:

Otis Elevator was issued a permit on February 19, 1999 for a stationary elevator and escalator manufacturing plant. A letter requesting changes to this permit was received on July 3, 2001. Pursuant to the provisions of 326 IAC 2-8-11.1 a significant permit revision to this permit is hereby approved.

The modification consist of changes to Sections A.3(b) & (c), B.11(c)(3) & (5), B.21(b) and D1.12(a)(1). These changes are shown in the Addendum to the Technical Support Document.

Pursuant to 326 IAC 2-8-11.1, this permit shall be revised by incorporating the significant permit revision into the permit. All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this modification and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Walter Habeeb, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (317) 232-8422.

Sincerely,

Original Signed by Paul Dubenetzky  
Paul Dubenetzky, Chief  
Permits Branch  
Office of Air Quality

Attachments

WVH

cc: File - Monroe County  
U.S. EPA, Region V  
Air Compliance Section Inspector - Joe Foyst  
Compliance Data Section - Karen Nowak  
Administrative and Development - Sara Cloe  
Technical Support and Modeling - Michele Boner

# PART 70 OPERATING PERMIT

## OFFICE OF AIR QUALITY

**United Technologies - Otis Elevator  
1331 South Curry Pike  
Bloomington, Indiana 47403**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T105-7565-00006	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: February 19, 1999  Expiration Date: February 19, 2004

Significant Permit Modification No.: T105-10972-00006	
Issued by:Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: October 29, 2001

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## SECTION A

## SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary elevator and escalator manufacturing plant.

Responsible Official: Mr. Carl W. Krull  
Source Address: 1331 South Curry Pike, Bloomington, IN 47403  
Mailing Address: 1331 South Curry Pike, Bloomington, IN 47403  
Phone Number: (812) 331-6922  
SIC Code: 3534  
County Location: Monroe  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD;  
Major Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

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This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) airless spray coating booth, identified as PB001, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 001);
- (2) one (1) high pressure-low volume (HPLV) spray coating booth, identified as PB017, with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID: 017);
- (3) one (1) HPLV spray coating booth, identified as PB024, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 024);
- (4) one (1) HPLV paint mix room spray booth, identified as PMR043, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 043);
- (5) one (1) HPLV spray coating booth, identified as PB044, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 044);
- (6) two (2) spray coating booths, identified as PB101 and PB102, utilizing HPLV application for PB101, and airless application for PB102, each with a maximum capacity of spraying 9.38 gallons of paint per hour, each using dry filters for particulate control, and each exhausting to one (1) stack (S/V ID 101 and 102 respectively);
- (7) one (1) HPLV adhesive coating booth, identified as GB002. GB002 has a maximum capacity of 7.03 gallons of adhesive per hour and is uncontrolled. The booth exhausts to one (1) stack (S/V ID G02); and

- (8) three (3) varnish dip tanks, identified as VD001, VD002, and VD003, all exhausting to one (1) stack (S/V ID: V01).

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 2-7-1(21)(G)(vi)(EE)]
- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations to include table saw's, belt sanders, tool grinders, wire strippers and routers. [326 IAC 2-7-1(21)(G)]
- (c) Other categories with PM10 emissions below 5 pounds per hour or 25 pounds per day; three (3) automatic powder paint booths, identified as PB018A, PB019A, and PB022A, each equipped with an automatic, enclosed recycling unit that collects the overspray powder and returns it to the system. [326 IAC 2-7-1(21)(B)]

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

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This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

## SECTION B

## GENERAL CONDITIONS

### B.1 Permit No Defense [IC 13]

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

### B.2 Definitions [326 IAC 2-7-1]

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Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

### B.3 Permit Term [326 IAC 2-7-5(2)]

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This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

### B.4 Enforceability [326 IAC 2-7-7(a)]

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- (a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.
- (b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source's potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

### B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

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The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

### B.6 Severability [326 IAC 2-7-5(5)]

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The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

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This permit does not convey any property rights of any sort, or any exclusive privilege.

### B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

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- (a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.
- (c) Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAQ, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAQ, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

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- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, except those specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)(C)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than July 1 of each year to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015



and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent ;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); and
  - (5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)]  
[326 IAC 1-6-3]

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:
    - (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
    - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
    - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that failure to implement the Preventive Maintenance Plan does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:
  - (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Quality,  
Compliance Section), or  
Telephone Number: 317-233-5674 (ask for Compliance Section)  
Facsimile Number: 317-233-5967

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
  - (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4(c)(10) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
    - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
      - (A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and
      - (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.
- Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

**B.14 Permit Shield [326 IAC 2-7-15]**

- (a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.
- (b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

- (1) The applicable requirements are included and specifically identified in this permit; or
- (2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.
- (c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAQ, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.
- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.
- (e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:
  - (1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;
  - (2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;
  - (3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and
  - (4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.
- (f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).
- (g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAQ, has issued the modifications. [326 IAC 2-7-12(c)(7)]
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ, has issued the modification. [326 IAC 2-7-12(b)(7)]

**B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]**

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit, or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless such failure has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

- (c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

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- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ, determines any of the following:
- (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]
- (c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

- (d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-7-3]  
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAQ, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as being needed to process the application.
- (d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]  
If IDEM, OAQ, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

**B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

- (b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule.

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

**B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)]**  
**[326 IAC 2-7-12 (b)(2)]**

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- (a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.
- (b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

**B.21 Operational Flexibility [326 IAC 2-7-20]**

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- (a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-1.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

- (b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

- (1) A brief description of the change within the source;
- (2) The date on which the change will occur;
- (3) Any change in emissions; and
- (4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:
  - (i) A brief description of the change within the source;
  - (ii) The date on which the change will occur;
  - (iii) Any change in emissions; and
  - (iv) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



- (d) Emission Trades [326 IAC 2-7-20(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).
- (e) Alternative Operating Scenarios [326 IAC 2-7-20(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAQ, or U.S. EPA is required.
- (f) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

**B.22 Construction Permit Requirement [326 IAC 2]**

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A modification, construction, or reconstruction shall be approved if required by and in accordance with the applicable provisions of 326 IAC 2.

**B.23 Inspection and Entry [326 IAC 2-7-6(2)]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

**B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.
- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.25 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Except as provided in 326 IAC 2-7-19(e), failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

## SECTION C

## SOURCE OPERATION CONDITIONS

Entire Source
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### Emission Limitations and Standards [326 IAC 2-7-5(1)]

- C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]  
Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- C.2 Opacity [326 IAC 5-1]  
Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in this permit:
- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
  - (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor in a six (6) hour period.
- C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]  
The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.
- C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]  
The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. The provisions of 326 IAC 9-1-2 are not federally enforceable.
- C.5 Fugitive Dust Emissions [326 IAC 6-4]  
The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.
- C.6 Operation of Equipment [326 IAC 2-7-6(6)]  
Except as otherwise provided in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

**C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;
    - (B) Removal or demolition contractor; or
    - (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

## **Testing Requirements [326 IAC 2-7-6(1)]**

### **C.8 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

## **Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]**

### **C.9 Compliance Schedule [326 IAC 2-7-6(3)]**

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The Permittee:

- (a) Has certified that all facilities at this source are in compliance with all applicable requirements; and
- (b) Has submitted a statement that the Permittee will continue to comply with such requirements; and
- (c) Will comply with such applicable requirements that become effective during the term of this permit.

### **C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]**

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Compliance with applicable requirements shall be documented as required by this permit. All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment after receipt of this permit. If due to circumstances beyond its control, that equipment cannot be installed and operated within ninety (90) days, the Permittee may extend the compliance schedule related to the equipment for an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.11 Monitoring Methods [326 IAC 3]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

**Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]**

**C.12 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]**

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

- (a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

- (b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (c) If the ERP is disapproved by IDEM, OAQ, the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.
- (d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.
- (e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.
- (f) Upon direct notification by IDEM, OAQ, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

---

If a regulated substance, subject to 40 CFR 68, is present at a source in more than a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

- (a) Submit:
  - (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
  - (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
  - (3) Verify to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.
- (b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

**C.14 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]**

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- (a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:
  - (1) This condition;
  - (2) The Compliance Determination Requirements in Section D of this permit;
  - (3) The Compliance Monitoring Requirements in Section D of this permit;
  - (4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and
  - (5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAQ upon request and shall be subject to review and approval by IDEM, OAQ. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :
    - (A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and
    - (B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

- (b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.
- (c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:
  - (1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.
  - (2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;
  - (3) An automatic measurement was taken when the process was not operating; or
  - (4) The process has already returned to operating within "normal" parameters and no response steps are required.
- (d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.15 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5]  
[326 IAC 2-7-6]

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAQ shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAQ within thirty (30) days of receipt of the notice of deficiency. IDEM, OAQ reserves the authority to use enforcement activities to resolve noncompliant stack tests.
- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).



## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **C.16 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]**

- (a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by July 1 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:
- (1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);
  - (2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.
- (b) The annual emission statement covers the twelve (12) consecutive month time period starting January 1 and ending December 31. The annual emission statement must be submitted to:
- Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

### **C.17 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]**

- (a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.
- (b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.
- (c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.
- (d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.
- (e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

- (f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

- (a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAQ, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Records of required monitoring information shall include, where applicable:
  - (1) The date, place, and time of sampling or measurements;
  - (2) The dates analyses were performed;
  - (3) The company or entity performing the analyses;
  - (4) The analytic techniques or methods used;
  - (5) The results of such analyses; and
  - (6) The operating conditions existing at the time of sampling or measurement.
- (c) Support information shall include, where applicable:
  - (1) Copies of all reports required by this permit;
  - (2) All original strip chart recordings for continuous monitoring instrumentation;
  - (3) All calibration and maintenance records;
  - (4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.
- (d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. The report(s) does(do) not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

### **Stratospheric Ozone Protection**

#### **C.20 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.
- (b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

**The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

The following surface coating activities:

- (1) One (1) airless spray coating booth, identified as PB001, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 001);
- (2) one (1) high pressure-low volume (HPLV) spray coating booth, identified as PB017, with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID: 017);
- (3) one (1) HPLV spray coating booth, identified as PB024, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 024);
- (4) one (1) HPLV paint mix room spray booth, identified as PMR043, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 043);
- (5) one (1) HPLV spray coating booth, identified as PB044, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 044);
- (6) two (2) spray coating booths, identified as PB101 and PB102, utilizing HPLV application for PB101, and airless application for PB102, each with a maximum capacity of spraying 9.38 gallons of paint per hour, each using dry filters for particulate control, and each exhausting to one (1) stack (S/V ID 101 and 102 respectively);
- (7) one (1) HPLV adhesive coating booth, identified as GB002. GB002 has a maximum capacity of 7.03 gallons of adhesive per hour and is uncontrolled. The booth exhausts to one (1) stack (S/V ID G02); and
- (8) three (3) varnish dip tanks, identified as VD001, VD002, and VD003, all exhausting to one (1) stack (S/V ID: V01).

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.1.1 Volatile Organic Compounds (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coatings), no owner or operator engaged in the surface coating of miscellaneous metal parts shall discharge into the atmosphere any volatile organic compound (VOC) in excess of the following:

- (a) The volatile organic compound (VOC) content of coating delivered to the applicator at the booths identified as PB044 and PB101 shall each be limited to 3.5 pounds of VOCs per gallon of coating less water, for air dried coatings.

Solvent sprayed from application equipment at PB044 and PB101 during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

**D.1.2 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]**

The coating operations shall use no more than 248.52 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) not applicable.

**D.1.3 Volatile Organic Compounds [326 IAC 8-2-9]**

- (a) The input VOC usage at the booth identified as GB001 shall not exceed 25.0 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents. Any change or modification which may increase potential emissions in excess of 25 tons per year shall be subject to the 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), before such change may occur.
- (b) The total input VOC usage at the booths identified as VD001, VD002, and VD003 shall not exceed 25.0 tons per twelve (12) consecutive month period, including coatings, dilution solvents, and cleaning solvents. Any change or modification which may increase potential emissions in excess of 25 tons per year shall be subject to the 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), before such change may occur.

**D.1.4 Volatile Organic Compounds (VOC) [H.E.A 1265] [326 IAC 8-2-9]**

Pursuant to exemption construction EQ105-10361-00006, the input VOC usage at the booth identified as PB102 shall not exceed 15.0 pounds per day, including coatings, dilution solvents, and cleaning solvents. Any change or modification which may increase VOC emissions in excess of fifteen (15) pounds per day shall be subject to the 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), and shall require approval from IDEM, OAQ prior to making the change.

**D.1.5 Particulate Matter (PM) [326 IAC 6-3-2(c)]**

Pursuant to 326 IAC 6-3-2(c) (Process Operations), the PM from the surface coating booths (PB001, PB017, PB024, PMR043, PB044, PB101, PB102, GB001 and GB002) shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

**D.1.6 Preventive Maintenance Plan [326 IAC 2-7-5(13)]**

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each facility and any control devices.

## **Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

### **D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits in Condition D.1.1, D.1.2, D.1.3 and D.1.4 and the PM limit specified in D.1.5, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

### **D.1.8 Volatile Organic Compounds (VOC)**

Compliance with the VOC content and usage limitations contained in Conditions D.1.1, D.1.2, D.1.3 and D.1.4 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

### **D.1.9 VOC Emissions**

- (a) Compliance with Condition D.1.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) consecutive month period.
- (b) Compliance with Condition D.1.4 shall be demonstrated within 30 days of the end of each day based on the total volatile organic compound usage for the most recent twenty-four (24) hour period.

### **D.1.10 Particulate Matter (PM)**

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

### **D.1.11 Training Requirements**

- (a) The Permittee shall implement an operator-training program.
  - (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.
  - (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

## **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

### **D.1.12 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include material safety data sheets (MSDS) necessary to verify the type used and may include purchase orders and invoices to verify the amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used at PB044 and PB101 for each day that any coating with VOC content greater than 3.5 pounds per gallon is used,
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.4.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include material safety data sheets (MSDS) necessary to verify the type used and may include purchase orders and invoices to verify the amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each day;
  - (4) The total VOC usage for each day; and
  - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with condition D.1.10 and D.1.11, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.13 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.



## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-7-5(15)]

**The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

The following specifically regulated insignificant activities:

- (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 2-7-1(21)(G)(vi)(EE)]
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 2-7-1(21)(B)]
- (3) Other categories with PM10 emissions below 5 pounds per hour or 25 pounds per day:
  - (a) Woodworking operations including the use of table saw's, belt sanders, tool grinders, wire strippers, and routers;
  - (b) three (3) automatic powder paint booths, identified as PB018A, PB019A, and PB022A, each equipped with an automatic, enclosed recycling unit that collects the overspray powder and returns it to the system. [326 IAC 2-7-1(21)(B)]

### Emission Limitations and Standards [326 IAC 2-7-5(1)]

#### D.2.1 Particulate Matter (PM) [326 IAC 6-3]

Pursuant to 326 IAC 6-3 (Process Operations), the allowable PM emission rate from the above listed insignificant activities shall each not exceed allowable PM emission rate based on the following equation:

Interpolation and extrapolation of the data for the process weight rate up to 60,000 pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$

where E = rate of emission in pounds per hour; and  
P = process weight rate in tons per hour

### Compliance Determination Requirement

#### D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**  
**Office of Air Quality**  
**COMPLIANCE DATA SECTION**  
  
**PART 70 OPERATING PERMIT**  
**CERTIFICATION**

Source Name: United Technologies - Otis Elevator  
Source Address: 1331 South Curry Pike, Bloomington, Indiana 47403  
Mailing Address: 1331 South Curry Pike, Bloomington, Indiana 47403  
Part 70 Permit No.: T105-7565-00006

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- 9 Annual Compliance Certification Letter
- 9 Test Result (specify) \_\_\_\_\_
- 9 Report (specify) \_\_\_\_\_
- 9 Notification (specify) \_\_\_\_\_
- 9 Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**PART 70 OPERATING PERMIT  
EMERGENCY/DEVIATION OCCURRENCE REPORT**

Source Name: United Technologies - Otis Elevator  
Source Address: 1331 South Curry Pike, Bloomington, Indiana 47403  
Mailing Address: 1331 South Curry Pike, Bloomington, Indiana 47403  
Part 70 Permit No.: T105-7565-00006

**This form consists of 2 pages, Page 1 of 2**

Check either No. 1 or No.2

- |      |                                                                                                                                                                                                                                                                                                                                                                                                  |
|------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 9 1. | This is an emergency as defined in 326 IAC 2-7-1(12)<br>C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and<br>C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16 |
| 9 2. | This is a deviation, reportable per 326 IAC 2-7-5(3)(C)<br>C The Permittee must submit notice in writing within ten (10) calendar days                                                                                                                                                                                                                                                           |

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency/Deviation:

Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**Part 70 Quarterly Report**

Source Name: United Technologies - Otis Elevator  
Source Address: 1331 South Curry Pike, Bloomington, Indiana 47403  
Mailing Address: 1331 South Curry Pike, Bloomington, Indiana 47403  
Part 70 Permit No.: T105-7565-00006  
Facility: surface coating booths and dip tanks  
Parameter: VOC usage  
Limit: 248.52 tons per twelve (12) consecutive month period

YEAR: \_\_\_\_\_

Month	VOC Usage (tons)	VOC Usage (tons)	VOC Usage (tons/yr)
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**PART 70 OPERATING PERMIT  
QUARTERLY COMPLIANCE MONITORING REPORT**

Source Name: United Technologies - Otis Elevator  
Source Address: 1331 South Curry Pike, Bloomington, Indiana 47403  
Mailing Address: 1331 South Curry Pike, Bloomington, Indiana 47403  
Part 70 Permit No.: T105-7565-00006

**Months:** \_\_\_\_\_ **to** \_\_\_\_\_ **Year:** \_\_\_\_\_

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

**9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD**

**9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.**

<b>Compliance Monitoring Requirement</b> (e.g. Permit Condition D.1.3)	<b>Number of Deviations</b>	<b>Date of each Deviation</b>

Form Completed By: \_\_\_\_\_  
Title/Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

## Indiana Department of Environmental Management Office of Air Quality

### Addendum to the Technical Support Document for a Part 70 Operating Permit

Source Name: United Technologies - Otis Elevator Company  
Source Location: 1331 South Curry Pike, Bloomington, Indiana 47403  
County: Monroe  
SIC Code: 3534  
Operation Permit No.: T105-10972-00006  
Permit Reviewer: Walter Habeeb

On June 11, 2001, the Office of Air Quality (OAQ) had a notice published in the The Herald Times, Bloomington, Indiana, stating that Otis Elevator Company had applied for a Part 70 Operating Permit to operate a stationary elevator and escalator manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On July 3, 2001, Otis Elevator Company submitted an appeal to the OAQ requesting the following changes to the Part 70 permit issued to Otis Elevator on February 19, 1999. This Significant Permit Modification is the resolution to that appeal.

#### Appeal Item I:

- I Modify Permit Section A.3(b) and(c), Specifically Regulated Insignificant Activities, (page 5) to read as follows:

- (b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. ~~[326 IAC 2-7-1(21)(B)]~~ **to include table saw's, belt sanders, tool grinders, wire strippers and routers. [326 IAC 2-7-1(21)(G)]**
- (c) Other categories with PM10 emissions below 5 pounds per hour or 25 pounds per ~~day~~ **day**;  
~~(1) Woodworking operations including the use of table saw's, belt sanders, tool grinders, wire strippers, and routers;~~
- ~~(2) To include~~ three (3) automatic powder paint booths, identified as PB018A, PB019A, and PB022A, each equipped with an automatic, enclosed recycling unit that collects the overspray powder and returns it to the system. [326 IAC 2-7-1(21)(B)]

Response to Appeal Item I:

Upon further review OAQ has decided to make the changes in Section A.3(b) and (c) as they have been detailed above.

Appeal Item II:

- II Section B.11(c)(3) and (5), Annual Compliance Certification (page 8) to be changed as follows:

(3) Weather compliance was ~~based on~~ continuous or intermittent ~~data~~;

(5) Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, **(and local agency when applicable)** may require to determine the compliance status of the source.

Response to Appeal Item II:

OAQ has decided to make the change in B.11(c)(3), which will allow this permit comply with the language in 40 CFR part 70.6(c)(5)(iii)(B). B.11(c)(5) will not be changed as this is only a note to be used when applicable.

Appeal Item III:

- III Section B.21(b) of the draft Permit duplicates Section B.21(c)(2) (page 15). Page 6 of the Technical Support Document states that Section B.21(b) will be removed from the Permit, but it has not been done.

~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:—~~

~~(1) A brief description of the change within the source;~~

~~(2) The date on which the change will occur;~~

~~(3) Any change in emissions; and~~

~~(4) Any permit term or condition that is no longer applicable as a result of the change.~~

~~The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).~~

~~(e)~~ **(b)**

Response to Appeal Item III:

Section B.21(b) duplicates Section B.21(c)(2) and it will be removed from the permit.

Appeal Item IV:

- IV Permit Section D.12(a)(1) (page 30). The Technical Support Document (page 22) states that the following language (in bold) will be added to the Permit Section but it was not



added.

- (1) the amount and VOC content of each coating material and each solvent used. Records shall include **coating and solvent usage documentation and** material safety data sheets (MSDS) necessary to verify the type used and may include purchase orders and invoices to verify the amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

Response to Appeal Item IV:

The above language (coating and solvent usage documentation and) will be added to Section D1.12(a)(1).

## **Indiana Department of Environmental Management Office of Air Quality**

### **Technical Support Document (TSD) for a Significant Permit Modification to a Part 70 Operating Permit**

#### **Source Background and Description**

<b>Source Name:</b>	United Technologies - Otis Elevator
<b>Source Location:</b>	1331 South Curry Pike, Bloomington, IN 47403
<b>County:</b>	Monroe
<b>SIC Code:</b>	3534
<b>Operation Permit No.:</b>	T105-7565-00006
<b>Operation Permit Issuance Date:</b>	February 19, 1999
<b>Permit Modification No.:</b>	105-10972-00006
<b>Permit Reviewer:</b>	Heidi Beyer

The Office of Air Quality (OAQ) has reviewed a modification application from Otis Elevator relating to the operation of a stationary elevator and escalator manufacturing plant.

#### **History**

On May 17, 1999, Otis Elevator submitted an appeal to the OAQ requesting the following changes to the Part 70 permit issued to Otis Elevator on February 19, 1999. This Significant Permit Modification is the resolution to that appeal. Some of the appeal items noted in this TSD were model changes initiated by OAQ and agreed upon by the source.

##### **Appeal Item 1:**

The entire permit should be updated to reflect the most recent version of the rule citations for 326 IAC, as appropriate. For example, Section B - General Conditions references 2-1-10, which has been repealed.

##### **Response to Appeal Item 1:**

Upon further review, the OAQ has decided to make the following changes to the permit (bolded language has been added and language with a line through it has been deleted):

1. The rule cite for ENSR has been removed from the second paragraph of the title page. This rule has been repealed.  
  
This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and ~~326 IAC 2-1-3.2~~ as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.
2. A.1 (General Information) the Compliance Data Section has asked that all permits now include the phone number in the general information. This will enable the section to contact the source regarding reporting requirements.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

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The Permittee owns and operates a stationary elevator and escalator manufacturing plant.

Responsible Official: Mr. Carl W. Krull  
Source Address: 1331 South Curry Pike, Bloomington, IN 47403  
Mailing Address: 1331 South Curry Pike, Bloomington, IN 47403  
**Phone Number: (812) 331-6922**  
SIC Code: 3534  
County Location: Monroe  
County Status: Attainment for all criteria pollutants  
Source Status: Part 70 Permit Program  
Minor Source, under PSD;  
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)]  
[326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) airless spray coating booth, identified as PB001, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 001);
- (2) one (1) high pressure-low volume (HPLV) spray coating booth, identified as PB017, with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID: 017);
- (3) one (1) HPLV spray coating booth, identified as PB024, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 024);
- (4) one (1) HPLV paint mix room spray booth, identified as PMR043, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 043);
- (5) one (1) HPLV spray coating booth, identified as PB044, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 044);
- (6) two (2) spray coating booths, identified as PB101 and PB102, utilizing HPLV application for PB101, and airless application for PB102, each with a maximum capacity of spraying 9.38 gallons of paint per hour, each using dry filters for particulate control, and each exhausting to one (1) stack (S/V ID 101 and 102 respectively);
- (7) ~~two (2) one (1) HPLV adhesive coating booths, identified as GB001 and GB002. GB001 has a maximum capacity of applying 9.38 gallons of adhesive per hour and is equipped with a dry filter for particulate control. GB002 has a maximum capacity of 7.03 gallons of adhesive per hour and is uncontrolled. The booths each exhausts to one (1) stack (S/V ID G01 and G02, respectively); and (Note: While negotiating the appeal, the source indicated that these units are no longer a part of the source, and they were removed from the permit.)~~  
**two (2) one (1) HPLV adhesive coating booths, identified as GB001 and GB002. GB001 has a maximum capacity of applying 9.38 gallons of adhesive per hour and is equipped with a dry filter for particulate control. GB002 has a maximum capacity of 7.03 gallons of adhesive per hour and is uncontrolled. The booths each exhausts to one (1) stack (S/V ID G01 and G02, respectively); and (Note: While negotiating the appeal, the source indicated that these units are no longer a part of the source, and they were removed from the permit.)**
- (8) three (3) varnish dip tanks, identified as VD001, VD002, and VD003, all exhausting to one (1) stack (S/V ID: V01).

3. A.3 (Specifically Regulated Insignificant Activities) has been changed to make the numbering match A.2.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1)(a) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. [326 IAC 2-7-1(21)(G)(vi)(EE)]
- (2)(b) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. [326 IAC 2-7-1(21)(G)(xxiii)]
- (3)(c) Other categories with PM10 emissions below 5 pounds per hour or 25 pounds per day:
  - (a)(1) Woodworking operations including the use of table saw's, belt sanders, tool grinders, wire strippers, and routers;
  - (b)(2) three (3) automatic powder paint booths, identified as PB018A, PB019A, and PB022A, each equipped with an automatic, enclosed recycling unit that collects the overspray powder and returns it to the system. [326 IAC 2-7-1(21)(B)]

4. B.1 (Permit No Defense) 326 IAC 2-1 has been repealed.

B.1 Permit No Defense ~~[326 IAC 2-1-10]~~ [IC 13]

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- (a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.
- (b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with ~~326 IAC 2-1-3-2~~ or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled "Permit Shield."

5. Since there are currently no certifications that do not require certification by the Responsible Official, B.10 (Certification) has been revised as follows:

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)] **[326 IAC 2-7-5(3)(C)]**

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- (a) **Where specifically designated by this permit or required by an applicable requirement, any** Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, ~~and any other certification required under this permit,~~ shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, on the attached Certification Form, with each submittal.
- (c) A responsible official is defined at 326 IAC 2-7-1(34).

6. B.11(Annual Compliance Certification) delete (c)(5), OAQ has decided that although we have the authority, it may be cumbersome for the source to list all insignificant activities in the annual compliance certification, so the requirement is being deleted from the permit.

**B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]**

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- (c) The annual compliance certification report shall include the following:
- (1) The identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was based on continuous or intermittent data;
  - (4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3); **and**
  - ~~(5) Any insignificant activity that has been added without a permit revision; and~~
  - ~~(6)~~**(5)** Such other facts, as specified in Sections D of this permit, as IDEM, OAQ, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

7. B.12 (Preventive Maintenance Plan) paragraph (b) and (c) have been revised.

**B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]**

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- (b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that ~~lack of proper maintenance~~ **failure to implement the Preventive Maintenance Plan** does not cause or contribute to a violation of any limitation on emissions or potential to emit.
- (c) PMP's shall be submitted to IDEM, OAQ, upon request and shall be subject to review and approval by IDEM, OAQ. **IDEM, OAQ, may require the Permittee to revise its Preventive Maintenance Plan whenever lack of proper maintenance causes or contributes to any violation.**

8. B.13 (Emergency Provisions) the rule cite in paragraph (e) has been revised to reflect the new Article 2 rule.

**B.13 Emergency Provisions [326 IAC 2-7-16]**

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- (e) IDEM, OAQ may require that the Preventive Maintenance Plans required under 326 IAC ~~2-7-4(c)(9)~~ **2-7-4(c)(10)** be revised in response to an emergency.

9. B.14 (Permit Shield) paragraph (d) has been revised to clarify the intent of the condition, and the rule cite in paragraph (h) has been revised to reflect the new Article 2 rule.

**B.14 Permit Shield [326 IAC 2-7-15]**

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- (d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application. **Erroneous information means information that the Permittee knew to be false, or in the exercise of reasonable care should have been known to be false, at the time the information was submitted.**
- (h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAQ has issued the modification. [326 IAC ~~2-7-12(b)(8)~~ **2-7-12(b)(7)**]

10. B.16 (b)(3) has been revised to be consistent with B.12.

**B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]**

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- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:
- (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or
  - (2) An emergency as defined in 326 IAC 2-7-1(12); or
  - (3) Failure to implement elements of the Preventive Maintenance Plan unless ~~lack of maintenance~~ **such failure** has caused or contributed to a deviation.
  - (4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

11. B.18(b)(1)(B) (Permit Renewal) 326 IAC 2-5 has been repealed.

**B.18 Permit Renewal [326 IAC 2-7-4]**

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- (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due. ~~[326 IAC 2-5-3]~~
12. Delete B.21 (Changes Under Section 502(b)(10) of the Clean Air Act) and revise B.20(b) (Operational Flexibility) as follows. Both conditions refer to the same rule and it makes more sense for them to be combined.

~~**B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]**~~

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~~The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:~~

- ~~(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.~~

~~(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).~~

**B.221 Operational Flexibility [326 IAC 2-7-20]**

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC ~~2-4~~ **2-1.1** has been obtained;

~~(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:~~

**(b) The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:**

- (1) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).**
- (2) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:**
  - ~~(1)(i)~~ A brief description of the change within the source;
  - ~~(2)(ii)~~ The date on which the change will occur;
  - ~~(3)(iii)~~ Any change in emissions; and
  - ~~(4)(iv)~~ Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

13. B.23 (re-numbered B.22)(Construction Permit Requirement) the referenced statute has been repealed therefore this condition has been revised.

**B.22 Construction Permit Requirement [326 IAC 2]**

~~Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, A~~ modification, construction, or reconstruction shall be approved ~~as if~~ required by and in accordance with **the applicable provisions of 326 IAC 2.**

14. B.24 (re-numbered as B.23)(Inspection and Entry) in order to clarify confidentiality B.24 has been revised. OAQ also determined that subpart (1) and (2) of paragraph (e) were unnecessary, therefore they have been deleted.

**B.23 Inspection and Entry [326 IAC 2-7-6(2)]**

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, **and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such**, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.  
[326 IAC 2-7-6(6)]

~~(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAQ, or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source. In the event that a claim of confidentiality is so asserted, neither IDEM, OAQ, nor an authorized representative, may disclose the information unless and until IDEM, OAQ, makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]~~

~~(2) The Permittee, **and** IDEM, OAQ, acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]~~

15. B.25 (re-numbered as B.24) (Transfer of Ownership or Operation) 326 IAC 2-1 has been repealed; therefore, this condition has been modified as follows:

~~B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]~~

~~Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:~~

- ~~(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch (**and local agency when applicable**), within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.~~
- ~~(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~
- ~~(c) IDEM, OAQ, shall reserve the right to issue a new permit.~~



**B.24 Transfer of Ownership or Operational Control [326 IAC 2-7-11]**

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- (a) **The Permittee must comply with the requirements of 326 IAC 2-7-11 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.**
- (b) **Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:**

**Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015**

**The application which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**

- (c) **The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]**

16. C.1 (PSD or Emission Offset Source Status) has been removed from this permit. The numbering of all subsequent C Conditions has changed accordingly.

~~C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]~~

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- ~~(a) The total source potential to emit VOC is limited to 249 tons per twelve (12) consecutive month period. Therefore, the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~
- ~~(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.~~

17. C.4(Incineration) has been revised to say that 326 IAC 9-1-2 is not federally enforceable.

**C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2. **The provisions of 326 IAC 9-1-2 are not federally enforceable.**

18. C.6(Operation of Equipment) has been revised since there may be control devices that are not required to be used to assure compliance with emission limitations.

**C.6 Operation of Equipment [326 IAC 2-7-6(6)]**

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**Except as otherwise provided in this permit, All** air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

19. C.7(Asbestos Abatement Projects) paragraph (e) has been revised to more accurately reflect the rule.

C.7 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

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- (e) Procedures for Asbestos Emission Control  
The Permittee shall comply with the **applicable** emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4, emission control requirements are ~~mandatory~~ **applicable** for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

20. C.8 (Performance Testing) has been revised to specify the locations of applicable procedures and analysis methods for performance testing.

C.8 Performance Testing [326 IAC 3-6]

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing ~~methods~~ **any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures** approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

- (b) All test reports must be received by IDEM, OAQ within forty-five (45) days after the completion of the testing. An extension may be granted by the ~~Commissioner~~ **IDEM, OAQ** if the source submits to IDEM, OAQ, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

21. C.10 (Compliance Monitoring) has been modified as follows to correct a grammatical mistake and to clarify when compliance monitoring must begin.

C.10 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

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Compliance with applicable requirements shall be documented as required by this permit. **All monitoring and record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.** The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment ~~no more than ninety (90) days after receipt of this permit~~. If due to circumstances beyond its control, ~~this schedule cannot be met~~ **that equipment cannot be installed and operated within ninety (90) days**, the Permittee may extend the compliance schedule **related to the equipment** for an additional ninety (90) days provided the Permittee notifies:

22. C.11 (Monitoring Methods) has been revised to clarify that the monitoring and testing requirement are located in Section D of the permit.

**C.11 Monitoring Methods [326 IAC 3]**

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Any monitoring or testing **required by Section D** performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

23. In C.13 (Risk Management Plans), the first paragraph has been revised to more closely match the rule language.

**C.13 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]**

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If a regulated substance, subject to 40 CFR 68, is present in a process at a source in more than the a threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

- (1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or
- (2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and
- (3) Verify to IDEM, OAQ, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAQ, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

24. C.18 (General Record Keeping Requirements) (c)(4) has been modified to match B.12.

**C.18 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]**

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(c) Support information shall include, where applicable:

- (1) Copies of all reports required by this permit;
- (2) All original strip chart recordings for continuous monitoring instrumentation;
- (3) All calibration and maintenance records;
- (4) Records of preventive maintenance shall be sufficient to demonstrate that ~~improper maintenance~~ **failure to implement the Preventive Maintenance Plan** did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

25. C.19 (General Reporting Requirements) has been changed as follows to clarify exactly which documents require certification by the responsible official.

C.19 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

- (a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported. **The Compliance Monitoring Report shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015
- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period. **The report(s) does(do) not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports. **The Emergency/Deviation Occurrence Report does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).**
- (f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.
- (g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

~~The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).~~

26. D.1.7 and D.2.2 (Testing Requirements) have been modified as follows:

D.1.7 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limits in Condition D.1.1, D.1.2, D.1.3 and D.1.4 and the PM limit specified in D.1.5, shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

**D.2.2 Testing Requirements [326 IAC 2-7-6(1),(6)]**

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing ~~at any specific time~~ when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.2.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

27. D.1.9 (VOC Emissions) Has been modified as follows to allow companies time to compile the required data.

**D.1.9 VOC Emissions**

- (a) Compliance with Condition D.1.2 shall be demonstrated **within 30 days of** ~~at~~ the end of each month based on the total volatile organic compound usage for the most recent twelve (12) consecutive month period.
- (b) Compliance with Condition D.1.4 shall be demonstrated **within 30 days of** ~~at~~ the end of each day based on the total volatile organic compound usage for the most recent twenty-four (24) hour period.

28. D.1.10 (Particulate Matter) has been revised to clarify which facilities the control is required for.

**D.1.10 Particulate Matter (PM)**

The dry filters on booths PB001, PB017, PB024, PMR043, PB044, PB101, PB102, and GB001 for PM control shall be in operation **and control emissions from the surface coating booths** at all times ~~when that~~ the surface coating booths are in operation.

29. Emergency/Deviation Occurrence Report the rule cite 326 IAC 2-7-5(3)(c) should have been a capital C, 326 IAC 2-7-5(3)(C).

**This form consists of 2 pages**

**Page 1 of 2**

Check either No. 1 or No.2	
9	1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (2) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9	2. This is a deviation, reportable per <del>326 IAC 2-7-5(3)(c)</del> <b>326 IAC 2-7-5(3)(C)</b> C The Permittee must submit notice in writing within ten (10) calendar days

30. Other typographical errors throughout the permit were corrected as needed.

Appeal Item 2:

Condition A.3, entitled, "Specifically Regulated Insignificant Activities," should be changed to read, "Insignificant Activities." The definition of insignificant activities is given in 326 IAC 2-7-1(21). The definition of "Specifically Regulated Insignificant Activities" was not found in IDEM's regulations and the meaning of the term is unclear. Otis requests that IDEM define what is meant by "Specifically Regulated Insignificant Activities."

Response to Appeal Item 2:

Specifically regulated insignificant activities referred to in Condition A.3 are those that have applicable requirements, such as state rules or NESHAPS, that must be included in the Title V Permit.

In order to clarify why certain insignificant activities are specifically regulated, rule cites will be added to the descriptions of the insignificant sources. The condition has been changed as follows:

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]  
[326 IAC 2-7-5(15)]

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This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. **[326 IAC 2-7-1(21)(G)(vi)(EE)]**
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. **[326 IAC 2-7-1(21)(B)]**
- (3) Other categories with PM10 emissions below 5 pounds per hour or 25 pounds per day:
  - (a) Woodworking operations including the use of table saw's, belt sanders, tool grinders, wire strippers, and routers;
  - (b) three (3) automatic powder paint booths, identified as PB018A, PB019A, and PB022A, each equipped with an automatic, enclosed recycling unit that collects the overspray powder and returns it to the system. **[326 IAC 2-7-1(21)(B)]**

Appeal Item 3:

Condition B.4(a) (Enforceability) states "All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM." Condition B.4 (a) should include the phrase, "except for the Facility Descriptions contained in A.1 through A.3 and Section D" after the phrase, "conditions in this permit."

According to Section A - Source Summary, the information describing the source (Otis Elevator - Bloomington, IN) contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions.

Response to Appeal Item 3:

It is noted that the concern expressed about Section D, refers to the information contained in the Facility Description Boxes at the beginning of each D Section. Since the paragraph preceding Conditions A.1 through A.3 states that the information contained in these conditions is descriptive information and does not constitute enforceable conditions, there will be no change to Conditions A.1 through A.3. Condition B.4 will also remain unchanged as a result of this comment; however, the following sentence will be placed in each Facility Description Box in Section D:

The information describing the process contained in this Facility Description Box is descriptive information and does not constitute enforceable conditions.

The permit has changed as follows:

**SECTION D.1 FACILITY OPERATION CONDITIONS**

Facility Description [326 IAC 2-7-5(15)]

**The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

The following surface coating activities:

- (1) One (1) airless spray coating booth, identified as PB001, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 001);
- (2) one (1) high pressure-low volume (HPLV) spray coating booth, identified as PB017, with a maximum capacity of spraying 9.38 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID: 017);
- (3) one (1) HPLV spray coating booth, identified as PB024, with a maximum capacity of spraying 2.81 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 024);
- (4) one (1) HPLV paint mix room spray booth, identified as PMR043, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 043);
- (5) one (1) HPLV spray coating booth, identified as PB044, with a maximum capacity of spraying 3.28 gallons of paint per hour, using dry filters for particulate control, and exhausting to one (1) stack (S/V ID 044);
- (6) two (2) spray coating booths, identified as PB101 and PB102, utilizing HPLV application for PB101, and airless application for PB102, each with a maximum capacity of spraying 9.38 gallons of paint per hour, each using dry filters for particulate control, and each exhausting to one (1) stack (S/V ID 101 and 102 respectively);
- (7) ~~two (2)~~ **one (1)** HPLV adhesive coating booths, identified as GB001 and GB002. ~~GB001 has a maximum capacity of applying 9.38 gallons of adhesive per hour and is equipped with a dry filter for particulate control. GB002 has a maximum capacity of 7.03 gallons of adhesive per hour and is uncontrolled. The booths each exhausts to one (1) stack (S/V ID G01 and G02, respectively); and~~
- (8) three (3) varnish dip tanks, identified as VD001, VD002, and VD003, all exhausting to one (1) stack (S/V ID: V01).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

**The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.**

The following specifically regulated insignificant activities:

- (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment.
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.
- (3) Other categories with PM10 emissions below 5 pounds per hour or 25 pounds per day:
  - (a) Woodworking operations including the use of table saw's, belt sanders, tool grinders, wire strippers, and routers;
  - (b) three (3) automatic powder paint booths, identified as PB018A, PB019A, and PB022A, each equipped with an automatic, enclosed recycling unit that collects the overspray powder and returns it to the system.

Appeal Item 4:

In Condition B.9 (Compliance with Permit Conditions), B.9(a) states, "The Permittee must comply with all conditions of this permit. Non-compliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for . . ." The second sentence of condition B.9(a) should be modified to state: "Non-compliance with any provisions of this permit may constitute a violation of the Clean Air Act and may be grounds for . . ."

Response to Appeal Item 4:

IDEM is aware that noncompliance with conditions that are not federally enforceable may not constitute a violation of the Clean Air Act. IDEM will make the following change to subsection (a) of Condition B.9:

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**B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]**

- (a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit, **except those specifically designated as not federally enforceable**, constitutes a violation of the Clean Air Act and is grounds for:
  - (1) Enforcement action;
  - (2) Permit termination, revocation and reissuance, or modification; or
  - (3) Denial of a permit renewal application.
- (b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.



Appeal Item 5:

Condition B.16 (Deviations from Permit Requirements and Conditions) discusses what does and does not constitute a deviation. Condition B.16(b) states that "A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include: (1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit. . ." The phrase, "unless tied to an applicable rule or limit, should be deleted.

All monitoring parameters are directly or indirectly "tied" to a rule or limit. An excursion from compliance monitoring is not an exceedance. Otis believes that the wording used in this condition is inconsistent with the intent of Condition B.19(b).

Response to Appeal Item 5:

In some cases, a violation of a monitoring parameter may be a violation of an emission limit, while other monitoring parameters are simply triggers for a source to begin response steps in order to avoid violating emission limits. For example, if an incinerator fails to maintain the range of temperatures allowed by the permit, that would be a deviation, but a pressure drop in a baghouse would not be considered a deviation, as long as proper response steps were taken. There will be no change to the permit as a result of this comment.

Appeal Item 6:

Condition B.16 (Deviations from Permit Requirements and Conditions) discusses what does and does not constitute a deviation. Under Condition B.16 (b)(4), the phrase, "unless such failure exceeds 5% of the required data in any calendar quarter," should be deleted.

Otis suggests that it would be difficult to determine if 5% of required reporting was not performed. A failure to record a monitoring parameter is not a deviation. Otis believes that the wording used in this condition is inconsistent with the intent of Condition B.16(b).

Response to Appeal Item 6:

Subsection (b)(4) states that the source may fail to make or record 5% of the compliance monitoring in a calendar quarter without it being a deviation. IDEM agrees that some compliance monitoring errors are not deviations. For instance, if a continuous data recorder runs out of ink, the information lost would likely not exceed 5% of the required data in any calendar quarter and would not be a deviation. If a permittee discovers an error in a submitted report, the error must be corrected and reported to IDEM.

Recording the results of the required monitoring is authorized under 326 IAC 2-7-5(3). By including the 5% exclusion language, IDEM is exercising the discretion granted under IC 13 -14-1-13 to recognize that minor gaps in this data need not be considered a deviation. IDEM has worked with many parties to determine that a 5% limit on missing data is realistic and generally accepted. There will be no change to the permit as a result of this comment.

Appeal Item 7:

The last sentence in B.16(b) states, "A permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation." This sentence should be deleted. There is no authority for this provision in the cited rule (326 IAC 2-7-5(3)(C)(ii)).

#### Response to Appeal Item 7:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past three years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Title V and FESOP permit programs.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." The Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. Response maintenance included inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and set the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the equipment to prevent an exceedance of an emission limit or violation of other permit requirements.

After issuing the first draft Title V permits in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was to remove the corrective action and related schedule requirements from the PMP requirement and placed them into some other requirement. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring.

IDEM agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps."

The CRP response steps and schedule requirements are examples of documenting procedures developed from good business practices and the prevention of environmental problems. Permittees already have maintenance schedules and trouble shooting guides that specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

326 IAC 2-7-5(3)(c)(i) sets out the reporting requirements to monitor at least every six months. This report must include an identification of all permit deviations. 326 IAC 2-7-5(3)(c)(ii) sets out a separate requirement for reporting those deviations, including the information required in each deviation report. There will be no change to the permit as a result of this comment.

Appeal Item 8:

Condition B.26 (Annual Fee Payment) discusses annual fee payments, including the time requirements to make payment. In order to make full use of regulatory statutes, including the fee payment and appeal process, the following statement should be inserted at the beginning of B.26(b): "Except as provided in 326 IAC 2-7-19(e). Failure to pay. . ."

326 IAC 2-7-19(e) allows Otis access for relief of differences arising between Otis and IDEM relative to actual emissions at the facility.

Response to Appeal Item 8:

The proposed change is acceptable and will be changed as follows in this permit; however, this change is not necessary since the applicable rule is cited in the condition.

**B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]**

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- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) **Failure Except as provided in 326 IAC 2-7-19(e), failure** to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAQ, Technical Support and Modeling Section), to determine the appropriate permit fee.

Appeal Item 9:

Condition C.20 discusses general reporting requirements for Otis. Condition C.20(a) states that a "Quarterly Compliance Monitoring Report shall be submitted to the agency." "Quarterly Compliance Monitoring Report" should be changed to "Semi-annual Compliance Monitoring Report." Please reference Otis' Appeal Item #6 (from May 15, 1998) to the proposed Title V (Part 70) permit. Please see Attachment C.

According to the Periodic Monitoring Guidance (Page 9) developed by the U.S. EPA, the permitting authority should consider the following factors (and others) when assigning periodic monitoring:

- z Technical and economic considerations associated with the range of possible monitoring methods;
- z The type of monitoring, process, maintenance, or control equipment data already available for the emissions unit; and
- z The likelihood of violating the applicable requirement.

These factors are relevant in the recommended revisions to Otis' monitoring, record keeping, and reporting requirements. For example, with respect to the first bullet item above, quarterly reporting requires unnecessary paper work for the facility, but does not provide any additional assurance than a semi-annual report, that compliance with applicable requirements will be met. It should be noted that Otis' operations are not continuous (i.e., intermittent) and as discussed below in Condition D.1.9(a), past emission reporting records from Otis indicate that actual emissions from the facility are low and do not merit a quarterly reporting program.

Otis recommends a semi-annual compliance demonstration for Condition D.1.2. The phrase “. . . shall be demonstrated at the end of each month based on the total volatile organic compound usage for the most recent twelve (12) consecutive month period.” should be replaced with “. . . shall be demonstrated semi-annually based on the total volatile organic compound usage for the most recent twelve (12) consecutive month period.”

As indicated in past annual emissions statements, Otis' actual VOC emissions are substantially below 250 tpy (the PSD trigger level). Because Otis' VOC emissions are significantly below the PSD trigger level, a monthly compliance demonstration for Condition D.1.2 (i.e., 326 IAC 2-2) is an unnecessary burden for Otis.

Based on the Periodic Monitoring Guidance developed by the U.S. EPA, the permitting authority should consider the likelihood of violating the applicable requirement when assigning compliance monitoring requirements. Based on past VOC emissions, the nature of the processes, and the operational requirements at the facility, it is not likely that Otis will violate the applicable requirement, without major facility design changes.

According to 40 CFR Part 70.6(3)(iii), the minimal requirements under federal law is every six months. Based on requirements and guidance provided by the U.S. EPA, Otis strongly urges IDEM to reconsider Semi-annual Monitoring in place of Quarterly Monitoring as is now listed in Condition C.20. Quarterly Monitoring reporting puts unnecessary burden on both the facility and the agency without gaining any additional assurance regarding compliance with applicable requirements. See also comments to D.1.13.

With respect to comments provided in Condition C.20 above, “. . . quarterly report . . .” Should be changed to “. . . semi-annual. . .” report.

Condition D.1.13 (Reporting Requirements) states, “A quarterly summary of the information to document compliance with Condition D.1.2 shall be submitted to the address listed in Section C...” The term “. . . quarterly summary. . .” should be replaced by “. . . semi-annual summary. . .” The phrase “. . . within thirty (30) days after the end of the quarter being reported,” should be replaced with “. . . within thirty (30) days after the end of the semi-annual period being reported.”

As indicated in the U.S. EPA's Fact Sheet for Periodic Monitoring, the EPA plans to concentrate its periodic monitoring efforts on facilities associated with:

1. Units whose uncontrolled or pre-controlled emissions exceed the threshold established under the Clean Air Act for a “major source;”
2. Non-major units that use control devices;
3. Non-major units with environmental justice concerns;
4. Non-major units that have significant impacts on air quality or that could pose significant risks;
5. Units for which the public raised significant concerns; and
6. Units for which proposed permits have no monitoring.

Otis elevator does not fit into any of these priority categories. Therefore, with respect to monitoring, record keeping, and reporting, Otis recommends that the minimal requirements described in the regulations be used and not more burdensome ones, (i.e., quarterly reports).

Response to Appeal Item 9:

The surface coating facilities at Otis Elevator are non-major units that use control devices, as described in #2 of U.S. EPA's Fact Sheet for Periodic Monitoring referenced above. In addition, this source is required to submit a quarterly report to demonstrate compliance with the Prevention of Significant Deterioration minor limit for VOCs. All reporting required of Otis Elevator will continue to be submitted quarterly.

Appeal Item 10:

It is not practical for Otis to conduct observations of its stacks during painting. As discussed during the May 17, 1999 meeting Otis' spray coating operations are intermittent, low volume, batch-type operations. Elevator pieces are spray coated on an as-needed basis and not to a consistent or pre-determined schedule. Requiring observations of stacks during painting operations would place a logistics burden on Otis Elevator that is unwarranted given the nature of its operations. Because Otis' spray coating operations are intermittent, there is no way to predetermine when painting will be conducted in any particular booth. Additionally, Roof and stack inspection poses some safety risk to employees performing these inspections because the roof must be accessed during the inspections.

Instead of a weekly inspection of visual observation of stacks while the booth is in operation, Otis' current plan requires that daily inspection of paint booth filters be conducted and documented by booth operators. Filter conditions are documented and corrective action is taken as required. This is a proactive approach to ensure that opacity is controlled at the source, the paint booth.

Otis is currently conducting monthly visual inspections of regulated stacks concurrent with monthly visual inspections for overspray on the rooftops and nearby ground. This inspection is not completed when the booths are in operation for the reasons detailed above. Records of these monthly inspections have been kept since January 1997. No incident of overspray has been found during these inspections. This demonstrates that Otis' proactive efforts to control opacity at the source have been successful.

Otis believes that the inspection methods outlined above are sufficient to assess the impact of its operations on the environment and demonstrate compliance with the Title V requirements.

Response to Appeal Item 10:

Properly operating the air pollution controls that are already in place is generally adequate to demonstrate compliance with 326 IAC 6-3 in lieu of a stack test and also assures compliance with applicable rules limiting fugitive dust, opacity, and (when necessary) Potential to Emit. In past operating permits, the OAQ has required sources to check the placement and integrity of the filters once a day as an effective means of ensuring proper operation and ongoing compliance. In addition, evidence of deposition on the rooftops or the ground strongly implies increased particulate matter emissions.

However, in some very specific cases, OAQ has re-evaluated such compliance monitoring provisions and has permitted less resource intensive provisions for some sources. Since Otis Elevator has a good compliance history, a compliance determination condition can be used in place of the compliance monitoring.

The Compliance Determination Condition is different than the Compliance Monitoring Condition. A Compliance Determination would be a violation of the permit if the units were not properly operated. A Compliance Monitoring condition would require corrective action of a problem, but the problem would not be considered a violation. Conditions D.1.10, D.1.11, and D.1.12 have been changed as follows:

**Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.10 Particulate Matter (PM)**

The dry filters on booths PB001, PB017, PB024, PMR043, PB044, PB101, PB102, and GB001 for PM control shall be in operation and control emissions from the surface coating booths at all times that the surface coating booths are in operation.

**D.1.11 Monitoring**

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters on all days that the spray coating booths are in operation. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (previously listed) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

**Compliance Determination Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]**

**D.1.10 Particulate Matter (PM)**

The dry filters for particulate matter overspray control shall be properly in place and maintained to ensure integrity and particulate loading of the filters at all times when the paint booths are in operation.

**D.1.11 Training Requirements**

- (a) The Permittee shall implement an operator-training program.
  - (1) All operators that perform surface coating operations using spray equipment or booth maintenance shall be trained in the proper set-up and operation of the particulate control system. All existing operators shall be trained within 60 days of the date of permit issuance. All new operators shall be trained upon hiring or transfer.
  - (2) Training shall include proper filter alignment, filter inspection and maintenance, and trouble shooting practices. The training program shall be written and retained on site. The training program shall include a description of the methods to be used at the completion of initial and refresher training to demonstrate and document successful completion. Copies of the training program, the list of trained operators and training records shall be maintained on site or available within 1 hour for inspection by IDEM.

- (3) All operators shall be given refresher training annually.
- (b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

### **Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]**

#### **D.1.12 Record Keeping Requirements**

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To document compliance with condition D.1.10 and D.1.11, the Permittee shall maintain a copy of the operator-training program, training records, and those additional inspections prescribed by the Preventive Maintenance Plan.

#### **D.1.12 Record Keeping Requirements**

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- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include **coating and solvent usage documentation** ~~purchase orders, invoices,~~ and material safety data sheets (MSDS) necessary to verify the type ~~and amount~~ used **and may include purchase orders and invoices to verify the amount used**. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The volume weighted VOC content of the coatings used at PB044 and PB101 for each day that any coating with VOC content greater than 3.5 pounds per gallon is used,
  - (4) The cleanup solvent usage for each month;
  - (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.4.
  - (1) The amount and VOC content of each coating material and solvent used. Records shall include **coating and solvent usage documentation** ~~purchase orders, invoices,~~ and material safety data sheets (MSDS) necessary to verify the type ~~and amount~~ used **and may include purchase orders and invoices to verify the amount used**. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each day;
  - (4) The total VOC usage for each day; and

- (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.10 and D.1.11, the Permittee shall maintain ~~a log of weekly overspray observations, daily and monthly inspections,~~ **a copy of the operator-training program, training records,** and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Appeal Item 11:

Condition D.1.12 (Record Keeping Requirements) discusses specific record keeping requirements for Otis. Condition D.1.12(a)(1) and (b)(1) include maintaining **purchase orders** and **invoices** (and other documentation) as part of the record keeping requirements. Purchase orders and invoices relative to coatings, thinners and solvents do not represent usage of these materials. Purchase orders and invoices represent the amount of material purchased, which is dependent on product/material cost, customer demand, and other market-driven conditions; however, purchasing documentation does not represent material usage or throughput.

Therefore D.1.12(a)(1) and (b)(1) should be modified to read: "The amount of VOC content of each coating material and solvent used. Records shall include coating and solvent usage documentation and MSDSs necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;"

Based on the Periodic Monitoring Guidance developed by the U.S. EPA, the permitting authority should consider the type of monitoring process, maintenance, or control equipment already available for the emissions unit. Otis already compiles information on material usage and chemical and physical characteristics (i.e., MSDS). Purchase order and invoice data is not currently compiled for environmental reporting purposes. This type of data is not relevant to actual or potential usage data and should not be extrapolated to imply air emissions.

Response to Appeal Item 11:

Conditions D.1.12 (a)(1) and (b)(1) have been changed as follows:

D.1.12 Record Keeping Requirements

- (a) To document compliance with Conditions D.1.1 and D.1.2, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1 and D.1.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include **coating and solvent usage documentation** ~~purchase orders, invoices,~~ and material safety data sheets (MSDS) necessary to verify the type and amount used **and may include purchase orders and invoices to verify the amount used.** Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The volume weighted VOC content of the coatings used at PB044 and PB101 for each day that any coating with VOC content greater than 3.5 pounds per gallon is used,
- (4) The cleanup solvent usage for each month;



- (5) The total VOC usage for each month; and
  - (6) The weight of VOCs emitted for each compliance period.
- (b) To document compliance with Condition D.1.4, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.4.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include **coating and solvent usage documentation** ~~purchase orders, invoices,~~ and material safety data sheets (MSDS) necessary to verify the type and amount used **and may include purchase orders and invoices to verify the amount used.** Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
  - (2) A log of the dates of use;
  - (3) The cleanup solvent usage for each day;
  - (4) The total VOC usage for each day; and
  - (5) The weight of VOCs emitted for each compliance period.
- (c) To document compliance with Conditions D.1.10 and D.1.11, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Appeal Item 12:

Section D.2 (Facility Operation Conditions) presents a brief facility description of “specifically regulated insignificant activities.” In Section D.2 and Section A.3, “Buffing” is listed under “specifically regulated insignificant activities.” The list is from 326 IAC 2-1.1-3(d) and 2-7-1(21)(xxiii)(BB), where “buffing is listed as an insignificant activity if it has a fabric filter with a design grain loading of 0.03 gr/dscf and a gas flow rate less than 4,000 acfm. The buffing operations are correctly identified as insignificant activities, but the citation should be 326 IAC 2-7-1(21)(B). Therefore the citation for this activity should be changed accordingly.

Response to Appeal Item 12:

The actual rule cite for the buffing process referred to above is 326 IAC 2-7-1(21)(G)(xxiii) For changes to condition A.3, please refer to the response to Comment 2. Condition D.2, Facility Operation Conditions has been changed as follows:

Facility Description [326 IAC 2-7-5(15)] - The following specifically regulated insignificant activities:

- (1) The following equipment related to manufacturing activities not resulting in the emission of HAPs: brazing equipment, cutting torches, soldering equipment, welding equipment. **[326 IAC 2-7-1(21)(G)(vi)(EE)]**
- (2) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations. **[326 IAC 2-7-1(21)(G)(xxiii)]**
- (3) Other categories with PM10 emissions below 5 pounds per hour or 25 pounds per day:
  - (a) Woodworking operations including the use of table saw's, belt sanders, tool grinders, wire strippers, and routers;
  - (b) three (3) automatic powder paint booths, identified as PB018A, PB019A, and PB022A, each equipped with an automatic, enclosed recycling unit that collects the overspray powder and returns it to the system. **[326 IAC 2-7-1(21)(B)]**